

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Santam Dhillon

Case No.

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 17th, 2020 in the county of St. Clair in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

Offense Description

Title 21 USC 841 (a)(1)

Possession with Intent to Distribute five kilograms
or more of a mixture or substance containing a
detectable amount of cocaine

This criminal complaint is based on these facts:

The attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: April 17, 2020

City and state: Detroit, MI

Complainant's signature

Paul Brumley, Special Agent, HSI

Printed name and title



Judge's signature

Honorable Anthony P. Patti, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF COMPLAINT

I, Jason Brumley, Special Agent of Homeland Security Investigations, Detroit, Michigan, United States Department of Homeland Security, being duly sworn, hereby states:

I. INTRODUCTION

1. I have been a Special Agent (SA) with Homeland Security Investigations (HSI) for the past fifteen years. Before this, I was a United States Customs Inspector for approximately three years.
2. The following information is based upon my own knowledge and previous experiences as well as the knowledge of fellow law enforcement officers. The following affidavit contains only those facts I believe necessary to establish probable cause and does not necessarily contain all the facts known at this time.
3. This affidavit is provided in support of a complaint against Santam Dhillon. Probable cause exists that Santam Dhillon violated 21 U.S.C. § 841(a)(1), Possession with Intent to Distribute five kilograms or more of a mixture or substance containing a detectable amount of cocaine.

II. PROBABLE CAUSE

4. On April 17, 2020, Customs and Border Protection (CBP) officers conducted an outbound inspection of Ontario plated (9274PZ) commercial tractor as it was proceeding into Canada at the Blue Water Bridge, Port Huron, Michigan Port of Entry (POE). The commercial tractor was driven by Santam DHILLON, a naturalized Canadian Citizen and resident of Inglewood, Ontario, Canada. The outbound inspection was initiated after DHILLON told CBP Officers, that he had a load of chocolate milk which was picked up in California. CBP Officers directed DHILLON and his commercial tractor into the CBP inspection area for a mobile X-Ray of the truck and trailer.

5. The CBP X-Ray of the tractor revealed anomalies in the bunk area of the cab to be bundles of a dense unknown substance. Physical inspection of the truck cab by CBP Officers revealed numerous individual kilogram sized objects that were vacuum sealed. While this was happening, DHILLON fell faint and CBP Officers notified EMS. DHILLON was later cleared my McLaren Port Huron and later taken back to the Blue Water Bridge.
6. CBP Officers retained one of the objects and tested the substance inside which tested positive for cocaine. CBP noticed a small amount of the packages appeared to be different from the others. CBP conducted a field test of the substance inside which tested positive for fentanyl. Approximately 39.9 kilograms of cocaine, and 5.65 kilograms of fentanyl were seized.
7. At approximately 0800hrs, Myself and Special Agent Greg Abair interviewed DHILLON. I advised DHILLON of his Miranda rights and asked him to sign the Miranda form that he had read the statements and understood them. DHILLON agreed to answer questions and stated that he had a mistake. DHILLON stated he was going to be paid \$10,000 by a Canadian National named Bobby DHALIWAL to pick up narcotics in California and transport them back to Ontario, Canada. DHILLON stated he entered the United States with a "legitimate" load destined for California. DHILLON stated he was given three cell phones from DHALIWAL. DHILLON stated he was contacted on one these phones and given an address in Rancho Cucamonga, California. DHILLON stated he drove to the address and was met an unknown Hispanic male and unknown Caucasian male. DHILLON stated the Caucasian male had the narcotics in a duffle bag and cardboard box. DHILLON stated he and the Caucasian male loaded the narcotics into the top bunk area of his cab. DHILLON stated he then continued his trip and dropped off his legitimate load, and then retrieved a legitimate load to return to Canada with.

8. Based upon the aforementioned facts, I believe that there is probable cause to believe that Santam Dhillon did knowingly and unlawfully possess with the intent to distribute 5 kilograms or more of a mixture or substance containing a detectable amount of cocaine, a schedule I controlled substance, all in violation of Title 21 USC 841 (a)(1).

Jason Brumley, Special Agent
Homeland Security Investigations

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Hon. Anthony P. Patti
United States Magistrate Judge

Dated: April 17, 2020